

# EXHIBIT 13

Hunters Capital, LLC v. City of Seattle

Andrea Friedhoff

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IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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HUNTERS CAPITAL, LLC, et	)	
al.,	)	
	)	
Plaintiffs,	)	
	)	Case No.
vs.	)	20-cv-00983-TSZ
	)	
CITY OF SEATTLE,	)	
	)	
Defendant.	)	

VIDEO-RECORDED VIDEOCONFERENCE DEPOSITION OF  
ANDREA FRIEDHOFF

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8:56 a.m.  
SEATTLE, WASHINGTON  
(All participants appeared via videoconference.)

DATE TAKEN: JUNE 30, 2022  
REPORTED BY: LORRIE R. CHINN, RPR,  
Washington Certified Court Reporter No. 1902  
Oregon Certified Court Reporter No. 97-0337

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1 A. -- or "and her phone shortly."

2 Q. Gotcha. And that message is dated July 6th at  
3 9:26 a.m., correct?

4 A. I can't see -- let me scroll over. Can you  
5 scroll over? The video -- our Brady Bunch is blocking  
6 the timestamp, but it looks like 9:20 something.

7 Q. Okay. Gotcha. Let me see if I can -- does  
8 that help?

9 A. Yes. 9:26 a.m., yep.

10 Q. And does that refresh your recollection as to  
11 whether you, in fact, did meet with her and get the  
12 phone close to the time 9:26 a.m. on July 6, 2020?

13 A. I see a subsequent text here at 9:28 that says  
14 I got her phone around that time.

15 Q. Okay. Yes. And you're referring to, let's  
16 see, row 8260, correct?

17 A. Let me look here. 8260. Hold on. I'm trying  
18 to pull it up on my end because --

19 MR. CRAMER: I think it's 8259  
20 technically.

21 Q. Oh, I'm sorry. I stand corrected. You're  
22 correct, Shane. So 8259?

23 A. Yes, that one at 9:20. Yep.

24 Q. Okay. So is it fair to say that you received  
25 the mayor's phone on or about 9:28 a.m. on July 6th,

1 2020?

2 A. Uh-huh, yes.

3 Q. Okay. And after that how long would it take  
4 you to -- before you gave the phone to Regi and  
5 Emmanuel?

6 A. I see a text from someone saying they'll be  
7 there in 30 minutes.

8 Q. Okay. And I can represent to you that the  
9 phone number that's in 8261, that's Regi Alencastro's  
10 phone number.

11 A. Okay. Great. Okay.

12 Q. And but do you recall whether it was Regi that  
13 came to pick up the phone or whether it was Emmanuel?

14 A. It was Regi. He was on duty that day.

15 Q. Okay. And when Regi arrived to pick up the  
16 phone, was the phone turned on, do you recall?

17 A. I don't know.

18 Q. Did you work with him to try to problem-solve  
19 any issues relating to the phone?

20 A. No. That wasn't my role.

21 Q. Okay. Did he ask you for any details about  
22 what had happened to the phone?

23 A. It looks like I -- she told me something about  
24 the calendar and can't send out emails, and I relayed  
25 that to Regi and Emmanuel.

## REPORTER'S CERTIFICATE

I, LORRIE R. CHINN, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010 authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify:

That the sworn testimony and/or remote proceedings, a transcript of which is attached, was given before me at the time and place stated therein; that any and/or all witness(es) were duly sworn remotely to testify to the truth; that the sworn testimony and/or remote proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or remote proceedings given and occurring at the time and place stated in the transcript; that a review of which was requested; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this 14th day of July, 2022.

*Lorrie R. Chinn*

LORRIE R. CHINN, RPR, COR  
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## ERRATA

**CASE NAME:** Hunters Capital, LLC v. City of Seattle

**DATE TAKEN:** 6/30/2022

**WITNESS:** Andrea Friedhoff

### CORRECTIONS

Page	Line	Now Reads	Should Read
49 (adobe)	20	'Yeah' at Page 49, Line 20 should be deleted consistent with my testimony immediately before an after that line	
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
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_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

*Andrea Friedhoff*

Signature of Deponent



## DECLARATION

**CASE NAME:** Hunters Capital, LLC v. City of Seattle

**DATE TAKEN:** 6/30/2022

**WITNESS:** Andrea Friedhoff

I declare under penalty of perjury under the laws of the State of Washington that I have read my within deposition, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the ERRATA flyleaf page hereof.

*Andrea Friedhoff*

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Andrea Friedhoff

Signed on the 1st day of August, 2022.